

Message Text

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PAGE 01 BUCHAR 03931 271030Z

44

ACTION TRSE-00

INFO OCT-01 EUR-25 ISO-00 EB-11 L-03 SS-20 NSC-10 CIAE-00

INR-10 NSAE-00 RSC-01 DRC-01 SCA-01 /083 W

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R 270950Z OCT 73

FM AMEMBASSY BUCHAREST

TO SECSTATE WASHDC 6808

LIMITED OFFICIAL USE BUCHAREST 3931

PLEASE PASS TREASURY FOR PATRICK AND FEINBERG FROM GORDON

E.O. 11652: N/A

TAGS: EFIN, RO

SUBJECT: INCOME TAX TREATY

1. DISCUSSIONS BETWEEN US AND ROMANIA DELIGATIONS ON AN INCOME TAX CONVENTION CONCLUDED OCTOBER 26 AND A DRAFT COMPLETED.

2. MINOR ISSUES UNRESOLVED INCLUDE: (1) INITIAL DURATION OF CONVENTION WHICH US DELEGATION ARGUED SHOULD BE A MINIMUM OF 3-5 YEARS. GOR DELEGATION WANTED NO MINIMUM, AND (2) TREATMENT OF ENTERTAINERS. US DELEGATION PROPOSED VERY LIMITED EXEMPTION, AS IN US-JAPAN TREATY. GOR DELEGATION PRESSED FOR NO EXEMPTION.

3. RESOLUTION OF ISSUES AND POSSIBLE DRAFTING REVISIONS TO BE COMPLETED BY CABLE OR POSSIBLY ANOTHER ROUND OF DISCUSSIONS IN WASHINGTON.

4. WITHHOLDING PROVISIONS ARE 10 PERCENT ON ALL DIVIDENDS, FILMS AND OTHER CULTURAL ROYALTIES, 15 PERCENT ON INDUSTRIAL ROYALTIES, AND 10 PERCENT ON INTEREST, WITH EXEMPTION FOR EX-IM AND OPIC.

5. DRAFT BEING POUCHED TO L&R. REQUEST THAT IRS PROMPTLY RETYPE AS MODIFIED (PATRICK PLEASE PURSUE), AND PREPARE DRAFT OF TECHNICAL MEMO. POSSIBILITY EXISTS THAT SIGNATURE OF TREATY MAY TAKE PLACE IN LATTER PART OF NOVEMBER OR EARLY DECEMBER.

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Message Attributes

Automatic Decaptioning: X
Capture Date: 01 JAN 1994
Channel Indicators: n/a
Current Classification: UNCLASSIFIED
Concepts: n/a
Control Number: n/a
Copy: SINGLE
Draft Date: 27 OCT 1973
Decaption Date: 01 JAN 1960
Decaption Note:
Disposition Action: RELEASED
Disposition Approved on Date:
Disposition Authority: morefirh
Disposition Case Number: n/a
Disposition Comment: 25 YEAR REVIEW
Disposition Date: 28 MAY 2004
Disposition Event:
Disposition History: n/a
Disposition Reason:
Disposition Remarks:
Document Number: 1973BUCHAR03931
Document Source: CORE
Document Unique ID: 00
Drafter: n/a
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Errors: N/A
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Original Handling Restrictions: n/a
Original Previous Classification: n/a
Original Previous Handling Restrictions: n/a
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Previous Handling Restrictions: n/a
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Review Exemptions: n/a
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EO Systematic Review
30 JUN 2005

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Subject: INCOME TAX TREATY
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